

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

MDL No. 3076

Case No. 1:23-md-03076-KMM

IN RE:
FTX Cryptocurrency Exchange Collapse Litigation

This document relates to:

ALL ACTIONS

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OMNIBUS MOTION FOR PRELIMINARY APPROVAL OF
FTX GLOBAL CLASS ACTION SETTLEMENTS**

MDL Plaintiffs have very good news. MDL Plaintiffs have worked assiduously to investigate and prosecute all claims against parties bearing any responsibility for damage caused to the Global Class. Plaintiffs have reached more than fifteen FTX Global Settlements, and have others near completion.¹ Plaintiffs have recently reached Global settlements with new MDL Defendants including MDL Accountants Track: Prager Metis, MDL Promoter Track: Udonis Haslem, and others not yet ripe for disclosure (the “*Second Tranche of Settlements*”). Based upon the pending fully briefed Motions, and continued coordination with the Estate, the MDL Plaintiffs are cautiously optimistic they can recover much of the billions of dollars in damage suffered by the FTX Global Class.

¹ On December 19, 2024 [ECF No. 799], June 30, 2025 [ECF No. 937], and July 22, 2025 [ECF No. 940], the Court granted preliminary approval to global class action settlements with fourteen FTX MDL Defendants (the “*First Tranche of Settlements*”): FTX Insider Defendants, Gary Wang, Nishad Singh, Caroline Ellison, and Dan Friedberg, as well as FTX Promoter Defendants, William Trevor Lawrence, Kevin Paffrath, Tom Nash, Brian Jung, Graham Stephan, Andre Jikh, Jeremy LeFebvre, Erika Kullberg, Creators Agency, LLC, and Shaquille O’Neal.

The Court already denied as moot pending motions against Defendants Prager and Haslem and ordered Plaintiffs to seek preliminary approval of those two settlements by January 27, 2026 [ECF Nos. 1001, 1029]. To incorporate newly pending settlements, facilitate cooperation with the Estate on Notice, and facilitate finalizing uniform settlement and preliminary approval documents, Plaintiffs now respectfully move this Honorable Court for an Order: (1) giving Plaintiffs until February 27, 2026 to file their Omnibus Motion for Preliminary Approval of First and Second Tranche of FTX Global Settlements. The Omnibus Motion will seek approval of all Global Class Settlements to date, so they have the same preliminary approval date, same opt-out, objection and notice deadlines, and same Final Fairness Hearing date.² This will promote efficiency and reduce costs to the class.

CONCLUSION

Plaintiffs respectfully request the Court enter an Order giving Plaintiffs until February 27, 2026 to file their Omnibus Motion for Preliminary Approval of First and Second Tranche of FTX Global Settlements. A proposed Order granting this unopposed motion is attached as **Exhibit A**.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1 (a)(3)

In compliance with Local Rule 7.1(a)(3), Plaintiffs' counsel certify they have conferred with counsel for Prager and Haslem in a good faith effort to resolve any issues raised in this motion and are authorized to state that none oppose the relief sought.

² In connection with granting preliminary approval of the First Tranche of Settlements, the Court already stayed all proceedings as to the First Tranche of Settlements, including preparation and dissemination of class notice, pending further order of this Court. See ECF Nos. 799, 937, and 940. Plaintiffs are in the process of developing—in coordination with the FTX Bankruptcy Estate—the notice plan and plan of distribution as to both the First and Second Tranches of Settlements, in order to streamline the process and expedite providing relief to all MDL Settlement Global Class Members.

Dated: January 12, 2026,

Respectfully submitted,

<u>Plaintiffs' Co-Lead Counsel</u>	
<p><u>By: /s/ Adam Moskowitz</u> Adam M. Moskowitz Florida Bar No. 984280 Joseph M. Kaye Florida Bar No. 117520 THE MOSKOWITZ LAW FIRM, PLLC Continental Plaza 3250 Mary Street, Suite 202 Coconut Grove, FL 33133 Office: (305) 740-1423 adam@moskowitz-law.com joseph@moskowitz-law.com service@moskowitz-law.com</p>	<p><u>By: /s/ David Boies</u> David Boies Alex Boies Brooke Alexander BOIES SCHILLER FLEXNER LLP 333 Main Street Armonk, NY 10504 Office: (914) 749-8200 dboies@bsfllp.com aboies@bsfllp.com balexander@bsfllp.com</p>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was filed on January 12, 2026, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz
Adam Moskowitz